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# B. Allen Clardy, Jr., Esquire

Also licensed in Washington, D.C. Top 100 Trial Lawyers Million Dollar Advocates Forum

# David W. Hartman, Esquire

S.C. Certified Mediator

December 14, 2012

Angela G. Strickland, Esq. Joel H. Smith, Esq. Bowman and Brooke, LLP 1441 Main St., Suite 1000 Columbia, SC 29201

Bard D. Borkon Bowman and Brooke, LLP 150 South Fifth Street, Suite 3000 Minneapolis, MN 55402

Re: Alacia C. Quinton as Personal Representative of the Estate of April Lynn Quinton v. Toyota Motor Corporation, Toyota Motor Sales USA, Inc., Toyota Motor Engineering and Manufacturing North America, Inc., Enterprise Leasing Company – Southeast, LLC Aiken Division 1:10-cv-02187-MBS

Our File No.: 2010-00017

#### Counsel:

Please find enclosed Plaintiff's Second Interrogatories and Request for Production to Defendants.

Should you have any questions, please do not hesitate to contact me. Thank you for your attention in this matter.

Sincerely,

THE CLARDY LAW FIRM, P.A.

Tilda A. Burgess

Paralegal to B. Allen Clardy, Jr.

/tab

cc: R. Graham Esdale, Jr., Esq.



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## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA AIKEN DIVISION

Alacia C. Quinton as PR for the Estate of April Lynn Quinton,	) C/A No. <u>1:10-2187-TLW-SVH</u> )
Plaintiff,	) PLAINTIFF'S SECOND
	) INTERROGATORIES AND REQUEST
V.	) FOR PRODUCTION TO DEFENDANTS
Toyota Motor Corporation, et al.,	)
Defendants.	) )

COMES NOW the Plaintiff in the above styled cause, and requests that the Defendants Toyota Motor Corporation ("TMC"), Toyota Motor Sales U.S.A., Inc. ("TMS"), Toyoda Gosei North America Corporation ("TGNA") and Toyota Motor Engineering & Manufacturing North America, Inc. ("TEMA"), collectively "Toyota Defendants," answer the following Interrogatories and Request for Production and within the time required by the *Federal Rules of Civil Procedure*. Each interrogatory is addressed to the knowledge and information of Defendant's attorneys, investigators, agents, employees, and other representatives. When a question is directed to Defendant, the question is also directed to the aforementioned persons.

These interrogatories shall be deemed continuing so as to require supplemental answers if the persons or entities to whom these interrogatories are addressed obtain further information between the time the initial answers are served and the time of trial.

## **INTERROGATORIES AND REQUEST FOR PRODUCTION**

- 1. State the amount of money paid to Geoff Germane, his company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.
- 2. State the amount of money paid to Robert Gratzinger, his company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.
- 3. State the amount of money paid to Karen Balavich, her company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.
- 4. State the amount of money paid to Catherine Corrigan, her company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.
- 5. State the amount of money paid to Michael Klima, his company, and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants, representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the Toyota Defendants for litigation consultation/testing/testimony.

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6. State the amount of money paid to William Van Arsdell, his company,

and/or its predecessor(s) in each of the last ten (10) years by the Toyota Defendants,

representatives of the Toyota Defendants, and/or attorney(s)/law firms representing the

Toyota Defendants for litigation consultation/testing/testimony.

7. State the amount of money paid to Exponent in each of the last ten (10)

years by each of the entities Toyota Motor Corporation, Toyota Motor Sales U.S.A., Inc.,

Toyoda Gosei North America Corporation, and Toyota Motor Engineering &

Manufacturing North America, Inc.

8. Produce copies of all interior occupant compartment size specifications for

passenger vehicles, SUVs, light trucks and vans manufactured by the Toyota Defendants

for the years 2007-2011.

9. Produce any documents, drawings, analyses, emails or any other document

by whatever name known which relate to Toyota's decision or reasons for not including a

roll over activated curtain shield airbag in the subject vehicle or any passenger car in its

line of vehicles.

Respectfully Submitted,

THE CLARDY LAW FIRM

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Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have served all counsel in this action with a copy of the foregoing document by mailing a copy of the same by United States Mail, postage prepaid to the following on this the Hay of Liver Der, 2012.

Joel H. Smith Angela G. Strickland Bowman & Brooke, LLP 1441 Main Street, Suite 1000 Columbia, SC 29201 (803) 726-0200

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Attorneys for Defendant
Toyota Motor Corporation;
Toyota Motor Sales, U.S.A., Inc.;
Toyota Motor Engineering and
Manufacturing North America, Inc.;
Toyoda Gosei North America Corp.

B. Allen Clardy